



THE OFFICE OF THE GENERAL COUNSEL

MEMORANDUM

To: Members, Shelby County Board of Education

Submitted by: Jennifer L. Ervin, General Counsel and Chief Legal Officer

Date: Thursday, April 18, 2019

Re: **Conclusions Regarding Investigation Into an Undated, Semi-Anonymous Complaint From "M. Jones"**

Board Members,

As you are aware, last Fall an undated, semi-anonymous complaint authored by an individual identifying himself or herself in the complaint simply as "M. Jones" was mailed to this office and other employees of Shelby County Schools ("SCS" or "District"), alleging, among other things, that SCS employee Dr. Joris Ray had sexually harassed the complainant (i.e. "M. Jones") and other women.¹ The undated, semi-anonymous complainant also asked that SCS investigate her allegations. Immediately after receiving the complaint, this office retained the law firm of Glankler Brown, PLLC to assist it in conducting an independent investigation into the complaint. Once notified of the allegations, Dr. Ray personally invited a full and complete investigation into the allegations.

As you will see from the law firm's initial and supplemental reports (see attached), and in accordance with its obligations under SCS Policy 4010 and applicable state and federal law, the District promptly and fully investigated the complaint lodged by "M. Jones." Individuals who worked closely with Dr. Ray on a daily basis were interviewed about the allegations, and a search was conducted into whether any other complaints of sexual harassment had been made against Dr. Ray at any time prior to the "M. Jones" complaint. The outside investigator also interviewed or attempted to interview all 19 individuals coded in the District's business information management system as being actively employed by the District and having a first-name initial of "M" and the last name "Jones." Of these 19 individuals, only one actually knew and worked at any point with Dr. Ray. That individual denies any sexual harassment by Dr. Ray. Ten of the individuals interviewed do not know Dr. Ray and denied making a complaint of sexual harassment against him. The investigator was unable to establish voice contact with the remaining eight individuals.

Following this office's receipt of the investigator's findings, which are provided below, this office permitted the passage of additional time in order to provide the remaining eight individuals with whom the investigator could not establish voice contact a fair and ample opportunity to respond to the investigator.

¹ The complaint appears to have been mailed to various District employees, including employees of this office, within days following the announcement of Dr. Ray's promotion to the position of Chief of Academic Operations and School Support.

MEMORANDUM

Summary of Investigation Into the Undated, Semi-Anonymous Complaint From "M. Jones"

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In brief, based on the results of the investigation, the investigator made the following findings:

- There is no evidence that Dr. Ray sexually harassed "M. Jones" or any other District employee. Other than the "M. Jones" letter, no complaints, anonymous or otherwise, have been made to SCBE's Labor and Employee Relations department about Dr. Ray. The two employees that work closest with Dr. Ray have never observed Dr. Ray act in an inappropriate manner, nor have they heard other employees complain about Dr. Ray's conduct. Additionally, another individual that directly reports to Dr. Ray stated that Dr. Ray has always acted professionally and appropriately in her presence. In fact, this individual offered that Dr. Ray is overly cautious when interacting with employees to ensure that he does not even give the appearance of impropriety.
- The author of the undated, semi-anonymous letter, "M. Jones," failed to comply with SCBE Policy 4010 in lodging his or her complaint. He or she did not make the complaint to his or her supervisor or to the Federal Rights Coordinator as required by SCBE Policy 4010. Additionally, in accordance with SCBE Policy 4010, the complainant did not provide: (1) his or her identity, (2) the location, date, time and circumstances surrounding alleged incidents, or (3) a description of what happened.

Having received no further information related to this complaint and based on the investigator's findings, this office has determined that the employment-related allegations made against Dr. Ray as captured in the undated, semi-anonymous complaint authored by "M. Jones" could not be verified and are, thus, without merit. Therefore, it is this office's opinion that it is appropriate to close this investigation.

Please contact me if you have any questions or need further clarification.

Sincerely,

Jennifer L. Ervin, Esq.
General Counsel & Chief Legal Officer
Shelby County Schools

cc: Dr. Joris M. Ray, Superintendent

Attachments



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September 28, 2018

PRIVILEGED/CONFIDENTIAL

Ms. Jennifer L. Ervin
General Counsel and Chief Legal Officer
Shelby County Board of Education
160 S. Hollywood, Room 218
Memphis, Tennessee 38112

**Re: Sexual Harassment Investigation Report re: Dr. Joris Ray
Our File No. 22891.61364**

Dear Ms. Ervin:

On or about September 25, 2018, Glankler Brown, PLLC was engaged to assist in an investigation in response to a semi-anonymous sexual harassment complaint made by "M. Jones" against Dr. Joris Ray ("Dr. Ray"). Specifically, M. Jones contends that Dr. Ray has sexually harassed M. Jones and other women. M. Jones requested that the Shelby County Board of Education ("SCBE") investigate M. Jones' complaint. To that end, we were asked to investigate M. Jones' complaint. We promptly began an investigation of M. Jones' complaint.

I. INTRODUCTION AND INVESTIGATIVE SUMMARY

On or about September 20, 2018, an envelope without a return address or name of the addresser was mailed to you.¹ The envelope contained a letter that purported to be from M. Jones and was directed to the "Board Commissioners and Superintendent Hopson."² In the letter, M. Jones complains that she was sexually harassed by Dr. Ray. M. Jones further complains that other women have also been sexually harassed by Dr. Ray. The letter does not

¹ The envelope is attached as Exhibit "1."

² M. Jones' letter is attached as Exhibit "2."

contain dates, times, or locations of the alleged incidents. Based on the allegations in the letter, it seems that M. Jones is an SCBE employee.

Through our investigation, we have been unable to substantiate the sexual harassment claims made in M. Jones' letter against Dr. Ray. The investigation is severely hampered because we have been unable to identify M. Jones. Therefore, we decided to interview individuals that worked closely with Dr. Ray to determine whether those individuals have been sexually harassed by Dr. Ray and, if not, whether those individuals were aware of allegations about Dr. Ray allegedly sexually harassing other SCBE employees.

Additionally, if M. Jones is an SCBE employee, she has failed to report the alleged sexual harassment to a supervisor or, if the supervisor is the offending party, to the Federal Rights Coordinator, as is required by SCBE policy.

II. INVESTIGATION METHODOLOGY

In order to investigate M. Jones' complaint and prepare findings, we interviewed the following SCBE employees:

- Dr. Ray, *Chief of Academic Operations* (May 17, 2017)
- [REDACTED], *Director of Labor and Employee Relations*
- [REDACTED], *Advisor to Dr. Ray*
- [REDACTED], *Assistant to Dr. Ray*
- [REDACTED], *Director, Attendance and Discipline*
- [REDACTED], *Teacher; Adolescent Parenting*

We reviewed Dr. Ray's personnel file. We also reviewed various: (1) Tennessee and federal statutes, cases and regulations, and (2) SCBE policies.

III. FACTS

A. Summary of M. Jones' letter.

In M. Jones' undated letter, she suggests that she is making a complaint against Dr. Ray at this point in time in light of the "me too" and "times' up" movements. M. Jones contends Dr. Ray has engaged in "inappropriate sexual harassment and misconduct." According to M. Jones, Dr. Ray uses his position with SCBE to "propose and exploit women."

Specifically, M. Jones states that Dr. Ray propositioned her "and then talked about [her] behind [her] back." M. Jones also apparently saw Dr. Ray "out behaving inappropriately with another SCS employee" that M. Jones did not identify. It seems that M. Jones consulted with other individuals to decide whether to report Dr. Ray's alleged behavior, and some discouraged her from reporting Dr. Ray while others encouraged her to report Dr. Ray. M. Jones further states that Dr. Ray's alleged improper conduct is "no secret."

In concluding her letter, M. Jones requests that SCBE investigate her complaint.

B. Interview of Dr. Ray.

We interviewed Dr. Ray regarding the allegations made in M. Jones' complaint. Dr. Ray is currently the Chief of Academic Operations, having been promoted to this position within the last week. He previously served as an Assistant Superintendent and Director of Alternative Schools for SCBE (legacy Memphis City Schools). He has been employed by SCBE for approximately twenty-two (22) years and has served in various capacities during that time.

Currently, Dr. Ray oversees eleven (11) departments. The leaders of those 11 departments, who are directors or managers, report directly to Dr. Ray. Seven of those department leaders are women. Additionally, two clerical staff members report directly to Dr.

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Ray—[REDACTED] and [REDACTED]. Dr. Ray's supervisor is Superintendent Hopson.

Dr. Ray manages a budget of approximately \$84 million.

Dr. Ray was adamant that he had not sexually harassed or otherwise acted inappropriately with any SCBE employee. Dr. Ray advised that during his 22 years of employment with SCBE, he had never been made aware of any complaints of sexual harassment. Additionally, no one has ever brought to Dr. Ray's attention that he had acted inappropriately with any employee. Dr. Ray has no idea who is making the complaint against him.

Dr. Ray was shown a list of approximately twenty-five (25) SCBE employees whose first names begin with "M" and whose last names are "Jones." Dr. Ray advised that the only female name he recognized on the list was [REDACTED] Jones. Dr. Ray stated that [REDACTED] Jones was a teacher at Adolescent Parenting, and that he has known [REDACTED] Jones since approximately 2003. The last time that Dr. Ray saw [REDACTED] Jones was at a CCTE informational session in May 2018. Dr. Ray stated that approximately 75 people were at the informational session and that he was never alone with [REDACTED] Jones. He also stated that he simply spoke to [REDACTED] Jones at the session and did not engage in any inappropriate communication or conduct with Ms. Jones.

Dr. Ray advised that he was investigated on one occasion in 2007 when an anonymous complaint was sent to the then-Memphis City Schools administration accusing Dr. Ray of improper and unethical hiring and misuse of school funds. The complaint was investigated by Internal Audit, and the allegations were found to be unsubstantiated.

C. Labor and Employee Relations.

SCBE's Labor and Employee Relations department is often called upon to investigation complaints made by employees against other employees. [REDACTED], who is currently the Director of Labor and Employee Relations, has been working in that department since 2006. [REDACTED]

[REDACTED] advised that the Labor and Employee Relations department has not received any complaints made against Dr. Ray for sexual harassment—anonymous or otherwise. Dr. Ray does not have a Labor Relations file.

D. Dr. Ray's direct reports.

We interviewed three (3) of Dr. Ray's direct reports: (1) [REDACTED], (2) [REDACTED], and (3) [REDACTED]. Each of these women stated unequivocally that Dr. Ray has never acted in an inappropriate manner with them. Additionally, these women stated that they had never heard anyone suggest that Dr. Ray had engaged in a sexually inappropriate manner. In fact, [REDACTED] suggested that Dr. Ray could be overly cautious in his communications and interactions with employees to ensure that there is not even the appearance that he is saying or acting inappropriately. Each of these women expressed how they enjoyed working with/for Dr. Ray, and that they believed that the majority of Dr. Ray's subordinates shared their views.

E. [REDACTED] Jones.

We interviewed [REDACTED] Jones, who is a teacher at Adolescent Parenting. [REDACTED] Jones advised that she was not the author of the sexual harassment complaint from M. Jones. [REDACTED] Jones confirmed that she has known Dr. Ray for more than fifteen (15) years, and that

Dr. Ray had not engaged in any inappropriate behavior with her. She was also not aware of, or familiar with, Dr. Ray engaging in inappropriate behavior with anyone else.

IV. SCBE POLICIES IMPLICATED BY M. JONES' COMPLAINT

A. SCBE Policy 4001—Equal Opportunity Compliance

This policy prohibits employment discrimination on the basis of race, color, religion, sex, creed, age disability, national origin, or genetic information in compliance with state/federal law. This policy requires that violations be reported to the Assistant Superintendent of Human Resources or if it is alleged that the Assistant Superintendent of Human Resources violated this policy, the notification of violation should be reported to the Superintendent.

B. Policy 4010--Harassment of Employees

This policy prohibits harassment and retaliation. It is a violation of this policy for employee to participate in harassment activities exhibited through disparaging conduct or communication that is sexual, racial, ethnic, or religious in nature. The policy defines harassment as:

conduct, advances, gestures or words either written or spoken to include those of a sexual, racial, ethnic, or religious nature which: (1) unreasonably interfere with an individual's work or performance; (2) create an intimidating, hostile or offensive work environment; (3) imply that submission to or rejection of such conduct will be used as a basis for an employment decision affecting the harassed employee.

The policy requires that victims immediately report harassment to their supervisor except when the supervisor is the offending party. If the offending party is a supervisor, employees are to make a report to the Federal Rights Coordinator at 160 S. Hollywood, Memphis, Tennessee. Allegations of harassment shall be promptly and fully investigated.

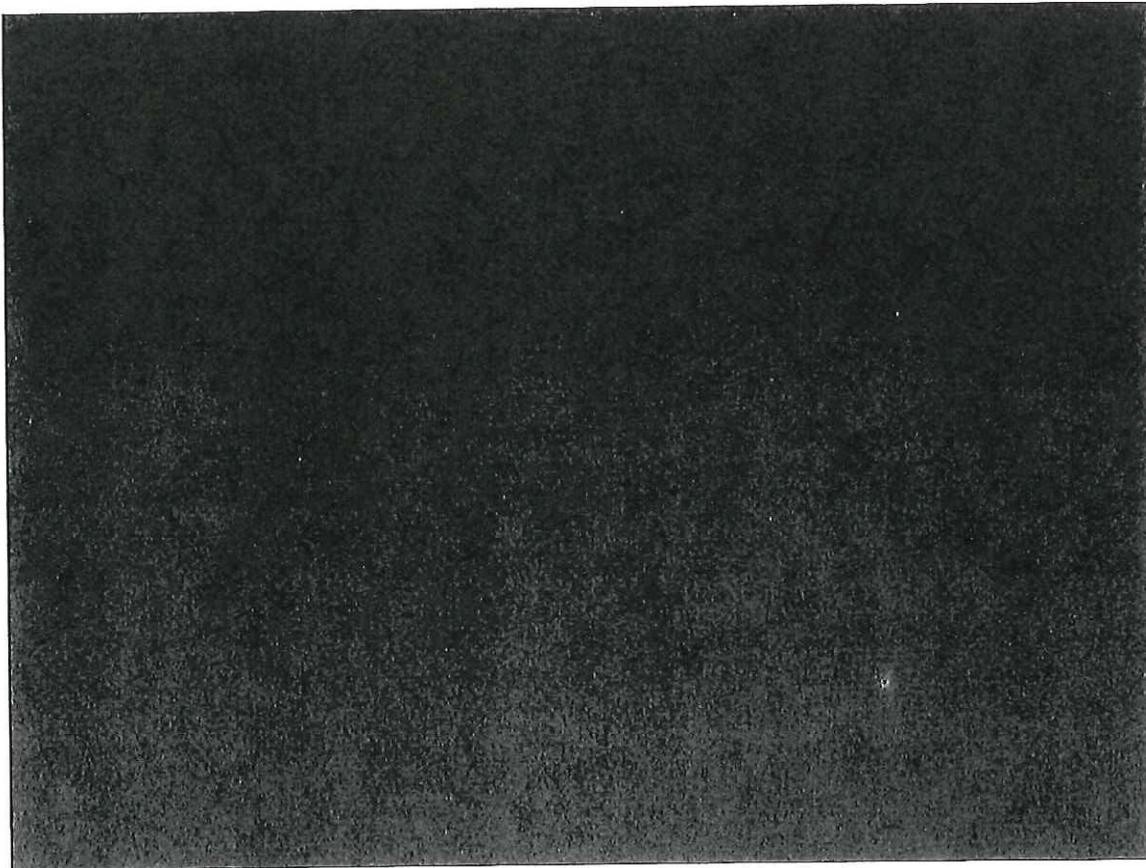
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A complaint is required to include: (1) identities of the alleged victim and person accused, (2) location, date, time and circumstances surrounding alleged incident, (3) description of what happened, and (4) any other evidence available.

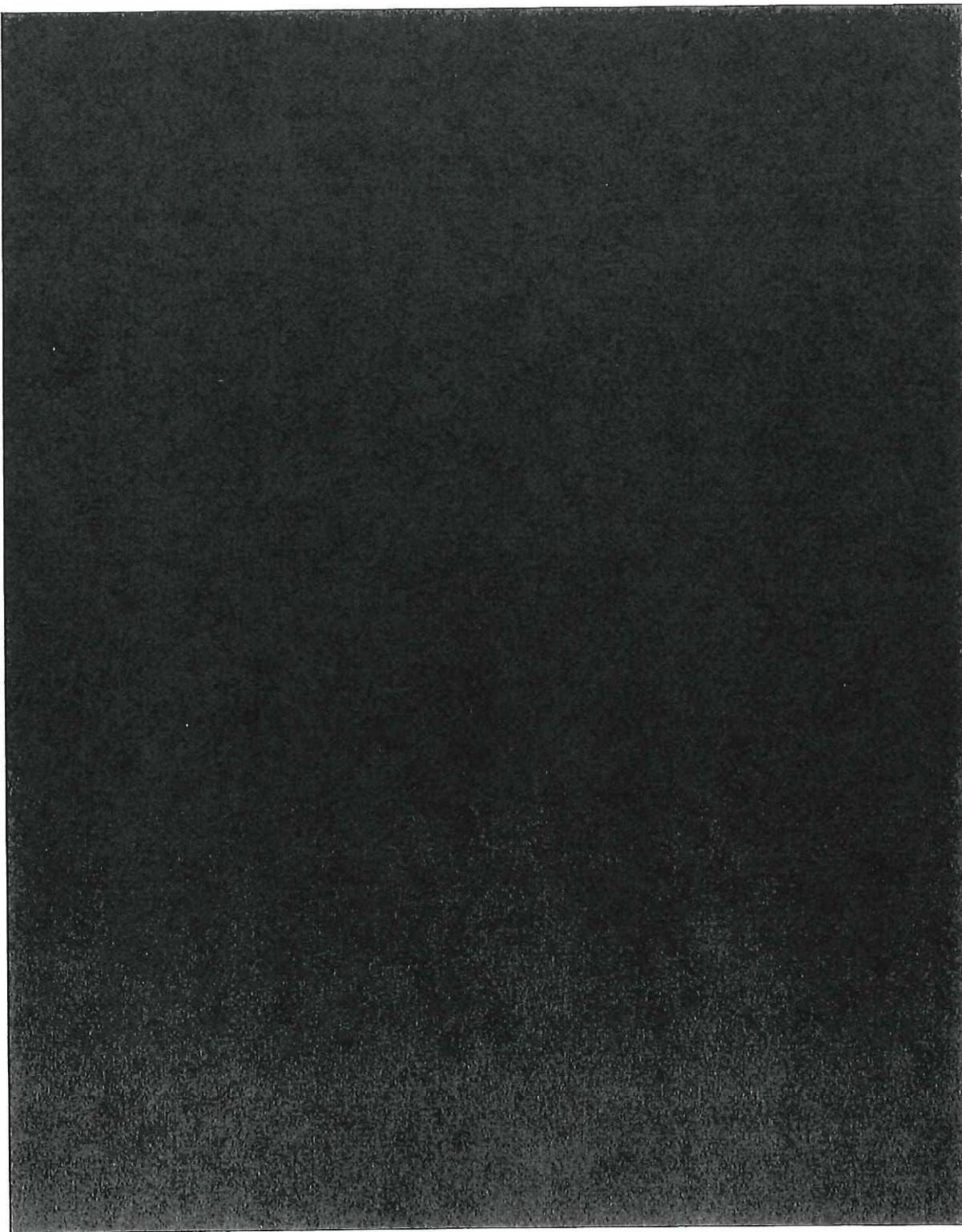
C. **Policy 4002--Staff Ethics**

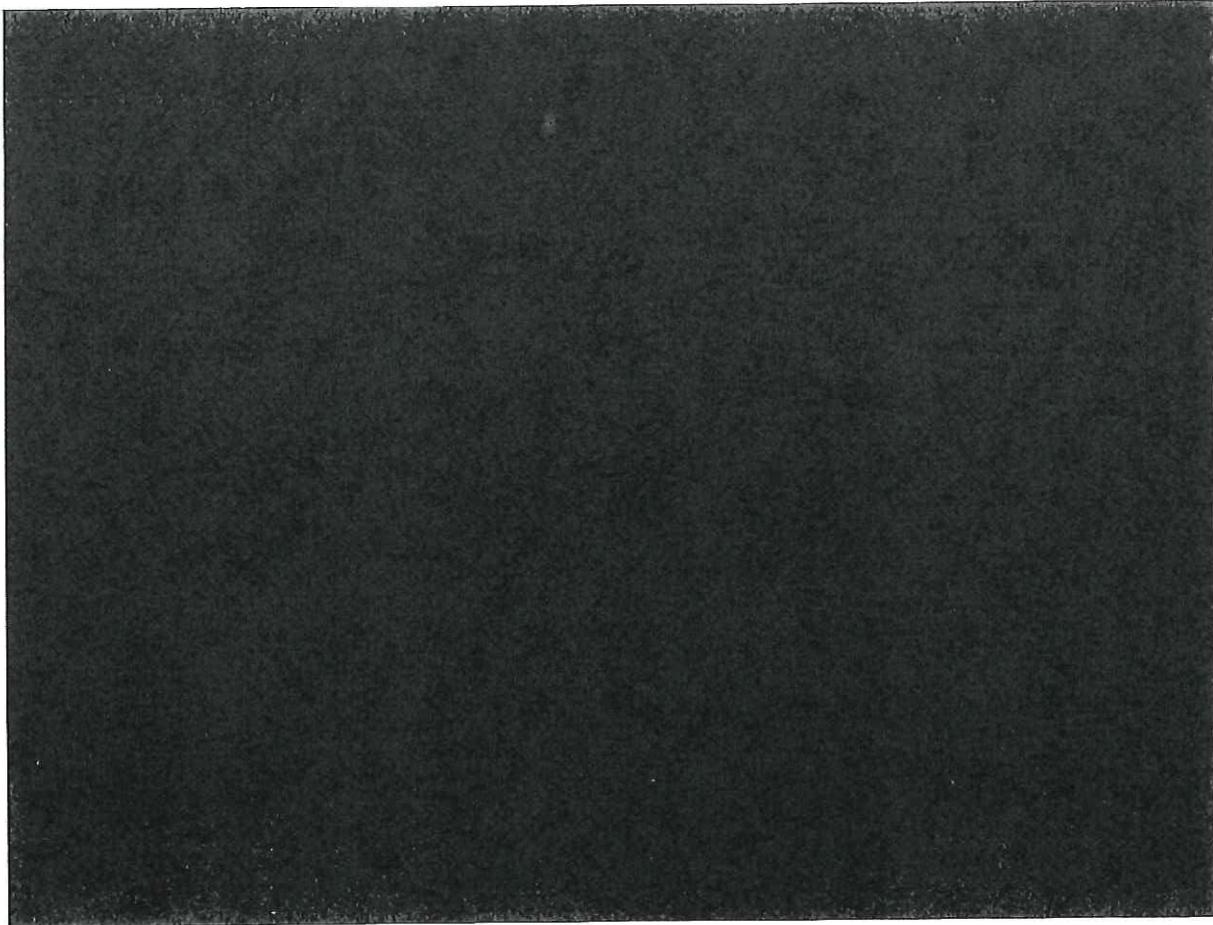
This policy: (1) requires that staff maintain a professional relationship with students, parents, staff members and community, and (2) Follow all policies and administrative rules. Failure to meet these standards may result in disciplinary action by the employer up to and including dismissal.

V. STATE/FEDERAL LAW REQUIREMENTS



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VI. FINDINGS

Based on the interviews with the above-mentioned individuals, reviewing certain documents provided by these individuals and others, and considering Tennessee/federal law and regulations and SCBE's policies, we make the following findings:

1. SCBE promptly and fully investigated the complaint lodged by M. Jones in accordance with SCBE Policy 4010 and Tennessee/federal law. We met with and questioned Dr. Ray. We interviewed individuals that work with Dr. Ray on a day-to-day basis about the allegations in the complaint. We sought to determine whether any other complaints of sexual harassment had been made against Dr. Ray at any point in time. We also interviewed the only

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person with first initial "M" and last name "Jones" that is currently employed by SCBE and known to Dr. Ray.

2. There is no evidence that Dr. Ray sexually harassed M. Jones or any other SCBE employee. Other than M. Jones' letter, no complaints, anonymous or otherwise, have been made to SCBE's Labor and Employee Relations department about Dr. Ray. The two employees that work closest with Dr. Ray, [REDACTED], have never observed Dr. Ray act in an inappropriate manner nor have they heard other employees complain about Dr. Ray's conduct. Additionally, [REDACTED], another individual that directly reports to Dr. Ray, stated that Dr. Ray has always acted professionally and appropriately in her presence. In fact, she offered that Dr. Ray is overly cautious when interacting with employees to ensure that he does not even give the appearance of impropriety.

3. M. Jones failed to comply with SCBE policy in lodging her complaint against Dr. Ray. She did not make her complaint to her supervisor or to the Federal Rights Coordinator as required by SCBE Policy 4010. Additionally, she did not provide: (1) her identity, (2) the location, date, time and circumstances surrounding alleged incident, or (3) a description of what happened. All of that information is required by Policy 4010.

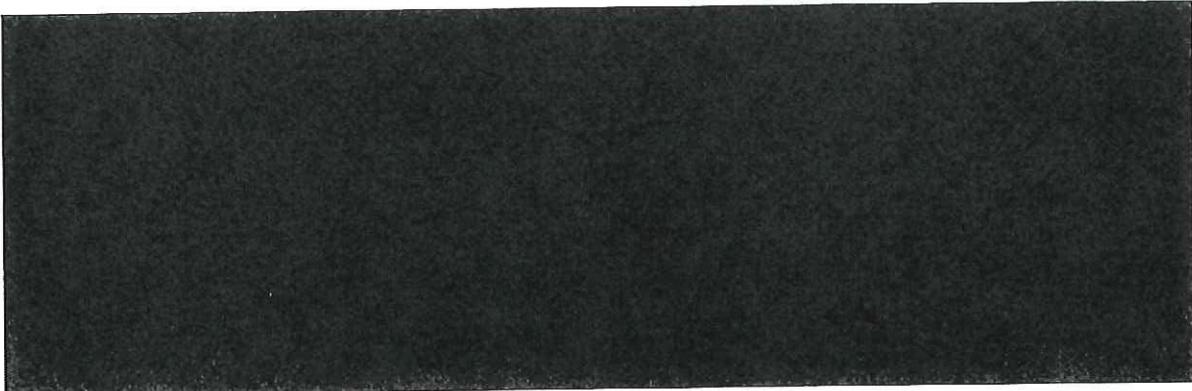
[REDACTED]

Additionally, M. Jones has unreasonably failed to take advantage of any preventive or corrective opportunities provided by SCBE or to avoid harm otherwise by failing

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to provide sufficient information for SCBE to determine when, where and how she was alleged sexually harassed. *See id.* Policy 4010, which is publicly available, describes the manner in which an individual can report harassment and the information needed to lodge a complaint. M. Jones did not lodge her complaint in the manner specified in the policy and she did not provide the information requested in the policy.

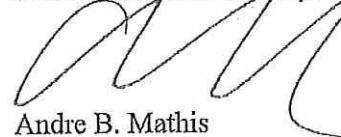
VII. RECOMMENDATIONS

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We thank you for allowing us to be of service in this matter and look forward to assisting you again in the future if the need arises. If you have any questions, do not hesitate to contact me.

Sincerely,

GLANKLER BROWN, PLLC


Andre B. Mathis

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Jennifer Ervin
Interim General Counsel & Chief Legal Officer
Shelby County Schools
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EXHIBIT

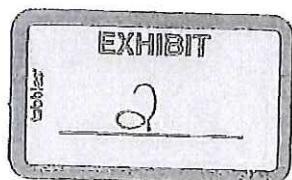
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Dear Board Commissioners and Superintendent Hopson,

In light of the "Me Too" and "Time up" movement I can no longer stay silent and watch or hear about inappropriate sexual harassment and misconduct. I am speaking about the antics of Dr. Joris Ray. As he builds his department by sucking up everyone's programs and money while hiring his incompetent fraternity brothers, he continues to use his power and position to proposition and exploit women. I know because he did it to me and then talked about me behind my back. I have heard other women talk about him doing it to them as well. I have been very hesitant to say anything out of fear of retaliation with many years before I can retire. Nevertheless I had to say something when I saw him out recently behaving inappropriately with another SCS employee. I was discouraged from saying anything by some and others said "do it". I also know he is married and said to be physically abusive and two of the many reasons I rejected him. I support the Superintendent 100% and think he does a wonderful job; unfortunately he has some people around him who are making him and the Board look uniformed and uncaring which I know isn't the truth. Superintendent Hopson should be more aware of the people he hires and really look into their background. I'm sure he doesn't know about Dr. Ray and his shenanigans but it's no secret just like others who are in top SCS management positions. It can't and shouldn't be ignored.

Hopefully this will be investigated. Too many people are talking about it and I don't think it's going away. Not if I can help it. Thank you for your time.

M. Jones





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October 12, 2018

PRIVILEGED/CONFIDENTIAL

Ms. Jennifer L. Ervin
General Counsel and Chief Legal Officer
Shelby County Board of Education
160 S. Hollywood, Room 218
Memphis, Tennessee 38112

**Re: Supplemental Sexual Harassment Investigation Report re: Dr. Joris Ray
Our File No. 22891.63611**

Dear Ms. Ervin:

On October 1, 2018, we submitted our initial report regarding our investigation in response to a semi-anonymous sexual harassment complaint made by “M. Jones” against Dr. Joris Ray (“Dr. Ray”). In the report, we mentioned that there were approximately 18 female SCBE employees whose first names begin with “M” and whose last names are “Jones”, and advised that we would interview those individuals regarding the sexual harassment complaint if you deemed it necessary. Upon your request, we have attempted to interview each of those 18 female SCBE employees. The results of our efforts are below.

I. INTERVIEWS

SCBE retrieved names and telephone numbers of its current female employees whose first initial is “M” and last name is “Jones” from its APECS system, a database with its most up-to-date contact information. SCBE then supplied this information to us for purposes of conducting the investigation. The names and contact information for these individuals is as follows:

resolved period.

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	Name	Job Title	Current Location/Campus	Contact Number
1	Jones, [REDACTED]	Summer Student Worker	[REDACTED]	(personal)
2	Jones, [REDACTED]	Classroom Teacher Pre-K	[REDACTED]	(personal)
3	Jones, [REDACTED]	School Secretary	[REDACTED]	(personal)
4	Jones, [REDACTED]	Classroom Teacher Secondary	[REDACTED]	(personal)
5	Jones, [REDACTED]	Substitute Teacher	[REDACTED]	(personal)
6	Jones, [REDACTED]	Student Hall Monitor	[REDACTED]	(work)
7	Jones, [REDACTED]	Classroom Teacher ESL	[REDACTED]	(personal)
8	Jones, [REDACTED]	Substitute Nutrition Technician	[REDACTED]	(personal)
9	Jones, [REDACTED]	Substitute Teacher	[REDACTED]	(personal)
10	Jones, [REDACTED]	Substitute Nutrition Technician	[REDACTED]	(personal)
11	Jones, [REDACTED]	Substitute Teacher	[REDACTED]	(personal)
12	[REDACTED]	Supervisor Trainee, School Nutrition	[REDACTED]	(personal)
13	Jones, [REDACTED]	Classroom Teacher K-5	[REDACTED]	(personal)
14	Jones, [REDACTED]	Classroom Teacher Secondary	[REDACTED]	(personal)
15	Jones, [REDACTED]	Substitute Teacher	[REDACTED]	(personal)
16	Jones, [REDACTED]	Computer Lab Assistant	[REDACTED]	(personal)
17	Jones, [REDACTED]	Classroom Teacher K-5	[REDACTED]	(personal)
18	Jones, [REDACTED]	Substitute Teacher	[REDACTED]	(personal)

Between October 9 and October 12, 2018, we attempted to contact each of these individuals. The following is a summary of the information we were able to obtain:

1. *██████████ Jones: We called three times on October 9th and one time on October 12th. No one answered any of the calls, and the voicemail is not set up. Therefore, contact could not be established.

2. ██████████ Jones: We called one time on October 9th and left a voicemail message. We received a return call indicating that the telephone number did not belong to Ms. ██████████ Jones.

3. *██████████ Jones: We called three times on October 9th and twice on October 12th. No one answered any of the calls, and the mailbox is full. Therefore, contact could not be established.

4. ██████████ Jones: We called twice on October 9th. Ms. ██████████ Jones indicated that she does not know Dr. Ray and did not have any information about the sexual harassment complaint against Dr. Ray.

5. ██████████ Jones: We called once on October 9th and left a voicemail message. Ms. ██████████ Jones called back the same day and indicated that she does not know Dr. Ray and did not have any information about the sexual harassment complaint against Dr. Ray.

6. ██████████ Jones: We called one time on October 9th and got her mailbox, which indicated that the telephone number did not belong to ██████████ Jones.

7. *██████████ Jones: We called twice on October 9th and left voicemail messages. We called Ms. ██████████ Jones twice on October 12th and left voicemail messages. We have not received a return call from Ms. ██████████ Jones. Therefore, contact could not be established.

8. [REDACTED] Jones: We called once on October 9th, and Ms. [REDACTED] Jones indicated that she does not know Dr. Ray and did not have any information about the sexual harassment complaint against Dr. Ray.

9. [REDACTED] Jones: We called three times on October 9th and once on October 12th. Ms. [REDACTED] Jones did not answer any of the calls, and her mailbox is full. We have not received a return call from Ms. [REDACTED] Jones. Therefore, contact could not be established.

10. * [REDACTED] Jones: We called three times: October 9th, 10th and 12th. Each time, an automated voice indicated that the telephone number had been disconnected. Therefore, contact could not be established.

11. * [REDACTED] Jones: We called three times: October 9th, 10th, and 12th. No one answered, and there was no way of leaving a voicemail message. Therefore, contact could not be established.

12. [REDACTED] Jones: We spoke with Ms. [REDACTED] Jones on October 12, 2018. Ms. [REDACTED] Jones indicated that she was not familiar with Dr. Joris Ray and did not have any information about the sexual harassment complaint against Dr. Ray.

13. * [REDACTED] Jones: We called three times: October 9th, 10th, and 12th. We left a voicemail message each time. Ms. [REDACTED] Jones did not return our calls. Therefore, contact could not be established.

14. [REDACTED] Jones: We spoke with [REDACTED] Jones on October 9th, 2018. [REDACTED] Jones is a male. He indicated that he did not have any information about a sexual harassment complaint against Dr. Ray.

15. [REDACTED] Jones: We spoke with Minnie Jones. Ms. [REDACTED] Jones advised that she did not know Dr. Ray and did not have any information about the sexual harassment complaint against Dr. Ray.. She stated that she is retired and only goes into schools occasionally as a substitute teacher.

16. [REDACTED] Jones: We spoke with Ms. [REDACTED] Jones on October 9th, 2018. Ms. [REDACTED] Jones advised that she does not know Dr. Joris Ray and did not have any information about the sexual harassment complaint against Dr. Ray.

17. [REDACTED] Jones: We spoke with Ms. [REDACTED] Jones on October 10th, 2018. Ms. [REDACTED] Jones advised that she does not know Dr. Joris Ray and did not have any information about the sexual harassment complaint against Dr. Ray.

18. * [REDACTED] Jones: We called three times: October 9th, 10th, and 12th. I left a voicemail message each time. Ms. [REDACTED] Jones did not return our calls. Therefore, contact could not be established.¹

III. SUPPLEMENTAL FINDING²

Based on the interviews/attempted interviews with the above-mentioned individuals, we make the following additional finding:

1. There is still no evidence that Dr. Ray sexually harassed M. Jones or any other SCBE employee. We have attempted to speak with a total of 19³ individuals with first initial "M" and last name "Jones" that are currently employed by SCBE. Only one of those individuals—[REDACTED] Jones—knows Dr. Ray. Ms. [REDACTED] Jones denies any sexual harassment by Dr. Ray. Ten of the individuals that we interviewed do not know Dr. Ray and

¹* indicates that we could not establish voice contact with this individual.

²We incorporate by reference the findings and recommendations from our initial investigation report.

³We previously interviewed [REDACTED] Jones.

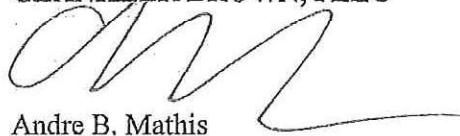
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denied making a complaint of sexual harassment against Dr. Ray. We were unable to establish voice contact with the remaining eight individuals.

We thank you for allowing us to be of service in this matter and look forward to assisting you again in the future if the need arises. If we are able to make voice contact with any of the individuals that we could not make contact with this week, we will let you know immediately. If you have any questions, do not hesitate to contact me.

Sincerely,

GLANKLER BROWN, PLLC



A handwritten signature in black ink, appearing to read "ABM".

Andre B. Mathis